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Attorneys for Defendant,
MCDONALD'S CORPORATION

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ALEXANDRA MIDDLETON, individually,

Plaintiff,

vs.

SNOWED INN, LLC, a Nevada Limited
Liability Company; and MCDONALD'S
CORPORATION, a Delaware Corporation;

Defendants.

Case No.: 2:20-cv-00017-RFB-NJK

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME FOR
MCDONALD'S CORPORATION TO
ANSWER OR OTHERWISE
RESPOND TO THE COMPLAINT**

[AMENDED FIRST REQUEST]

Plaintiff Alexandra Middleton and Defendant McDonald's Corporation, by and through
their respective counsel, stipulate as follows:

1 WHEREAS, on January 6, 2020, Middleton filed a civil complaint against McDonald's
2 and others in this Court (the "Complaint") (ECF No. 1);

3 WHEREAS, on January 30, 2020, Middleton personally served McDonald's with the
4 Complaint;

5 WHEREAS, McDonald's retained the undersigned counsel in connection with the above-
6 captioned matter on February 19, 2020;

7 WHEREAS, McDonald's answer or other response to the complaint is currently due to be
8 filed with this Court on February 20, 2020;

9 WHEREAS, the Complaint alleges four causes of action and includes 140 paragraphs
10 that require specific responses;

11 WHEREAS, the undersigned counsel for McDonald's represents that, based upon their
12 date of retention, good cause exists for additional time is needed in order to preliminarily
13 investigate the facts underlying the claims in a manner sufficient for McDonald's to accurately
14 and completely respond to each allegation, and to determine applicable affirmative defenses;

15 WHEREAS, McDonald's has not previously requested any extension of time to respond
16 to the complaint;

17 WHEREAS, the parties' original submittal of this stipulation (ECF No. 11), was denied
18 without prejudice (ECF No. 13), and the parties herein provide this Court additional information
19 to support good cause for this stipulation;

20 THEREFORE IT IS HEREBY STIPULATED, CONSENTED TO AND AGREED
21 between the undersigned parties, good cause exists for the reasons set forth above, that the due
22 date for McDonald's response to the complaint is extended to March 5, 2020.

23 Dated: February 25, 2020

24 LAGOMARSINO LAW

SANTORO WHITMIRE, LTD

25 /s/ Andrew M. Lagomarsino

/s/ Jason D. Smith

26 ANDREW M. LAGOMARSINO

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Corporation

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: February 26, 2020